



**William H. Johnson**  
Vice President and Associate General Counsel

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July 25, 2013

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street S.W.  
Room TW-A325  
Washington, DC 20554

**Re: In the Matter of Application of Verizon New Jersey Inc. and Verizon New York Inc. To Discontinue Domestic Telecommunications Services, WC Docket No. 13-150**

Dear Ms. Dortch:

We write to bring to the Commission's attention recent activities of the Communications Workers of America (CWA) that may have caused its members to violate customer proprietary network information (CPNI) regulations designed to protect the privacy of Verizon's customers.

CWA and its allies have been vocal in their opposition to any plans of Verizon related to its Voice Link product. Voice Link is a home phone service that uses wireless technology to deliver voice service to customers. It was primarily designed as an option for use by Verizon's voice-only customers who have experienced repeated problems with the legacy copper facilities serving their homes. On the western side of Fire Island, New York, and in small portions of the New Jersey barrier islands, where copper facilities were severely damaged by Superstorm Sandy and where there are significant environmental challenges, Verizon has also deployed Voice Link in an effort to efficiently and quickly restore reliable voice service for its customers.

Although Verizon's unionized work force installs and maintains Voice Link units, Voice Link allows customers to obtain voice telephone service using reliable wireless technology and is expected to require fewer repairs. CWA has engaged in an orchestrated campaign to generate opposition to any plans involving Voice Link and to otherwise discourage use of this product. (See, *e.g.*, attached letters) CWA and its allies have spread misinformation about the capabilities and limitations of Voice Link, as well as Verizon's use of and plans for Voice Link. While Verizon will continue to correct misinformation about Voice Link and about its plans for and deployment of Voice Link, at least one CWA local engaged in actions that may have caused its

members to violate the Commission's CPNI regulations (as well as Verizon's employee Code of Conduct).

Specifically, earlier this week in a recorded message for the members of CWA Local 1126, CWA asked members to provide the union with copies of all trouble tickets or install orders involving Voice Link, stating: "If you are dispatched on an order or a trouble for any of these [Voice Link] boxes, the union needs a copy of that order or trouble immediately." These trouble tickets and install orders include information, such as the service plan subscribed to and the technical configuration that will be used to provide service to the customer, that falls within the Commission's definition of CPNI. *See* 47 U.S.C. § 222(h)(1). In addition, CWA requested that this information be provided to the union without the consent of the customer and for a purpose that does not relate to Verizon's provision of service to that customer.

Upon learning of the recording, Verizon immediately alerted CWA in an effort to prevent a breach of CPNI, and we understand that the recording now has been removed, though we do not know if the same message has been conveyed in other ways. Verizon also is issuing a bulletin to our technicians and call center employees nationwide reminding them of their obligation to maintain the confidentiality of customer information, particularly in cases where a third party has requested access to this information. At this time, we have not determined whether any CPNI was inappropriately disclosed, nor has CWA provided any information on what customer information may have been inappropriately used or disclosed. We are continuing to investigate the matter. In the meantime, we respectfully request that the Commission direct CWA to immediately cease and desist from any activities that may induce its members to inappropriately use or disclose CPNI of any customer.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "William H. Johnson", with a stylized flourish at the end.

William H. Johnson

CC: Sean Lev, General Counsel  
Robert H. Ratcliffe, Acting Chief, Enforcement Bureau

## Sample Letter To PSC And Governor Cuomo To Protect Jobs By Halting the Voicelink Deployment

(This Letter has been checked By CWA attorneys.  
Please do not Deriate from this text)

Dear Governor Cuomo and Commissioner Brown:

Verizon is in the process of deploying a wireless-only substitute for traditional, "Landline" telephone service called Voicelink. This work is already underway on the western part of Fire Island. But it is part of Verizon's much larger strategy to replace traditional landline service with wireless in areas across the state where it is not building it's state-of-the-art FiOS network.

Voicelink threatens workers as well as consumers. The substitution of Voicelink wireless for wireline will accelerate the loss of good-paying jobs of Verizon technicians, whose numbers have already been cut by more than half in the last seven years. Voicelink cannot provide DSL, it cannot serve medical or home safety alarms, and it does not have auxiliary power. Because it cannot provide DSL, ~~it cannot~~ small businesses will have to pay exorbitant charges to process credit card transactions.

Over 5,000 CWA members wrote to the PSC last year to urge the Commission to strengthen service quality standards to protect consumers, to whom we want to provide good service. The PSC rejected our appeals, as well rejecting a petition from the Attorney General

and a letter from senior, labor and consumer groups.  
And As we predicted, service quality has continued to deteriorate, causing more customers to drop service, which leads to more job cuts.

We urge you stop Verizon from abandoning the copper network in non-FIOS areas and replacing it with Voicelink. We urge you to conduct a full investigation into the impact of these proposed changes, which will destroy jobs and endanger service quality and even public ~~service~~ safety during a disaster. We urge you not to allow Verizon to delay Voicelink statewide.

Sincerely,

Anthony Kirtori

**SAMPLE LETTER TO PSC AND GOVERNOR CUOMO TO PROTECT JOBS BY HALTING  
THE VOICELINK DEPLOYMENT**

(THIS LETTER HAS BEEN CHECKED BY CWA ATTORNEYS. PLEASE DO NOT  
DEVIATE FROM THIS TEXT)

Dear Governor Cuomo and Commissioner Brown:

Verizon is in the process of deploying a wireless-only substitute for traditional, "landline" telephone service called VoiceLink. This work is already underway on the western part of Fire Island. But it is part of Verizon's much larger strategy to replace traditional landline service wireless in areas across the State where it is not building its state-of-the-art FiOS network.

VoiceLink threatens workers as well as consumers. The substitution of VoiceLink wireless for wireline will accelerate the loss of good-paying jobs of Verizon technicians, whose numbers have already been cut by more than half in the last seven years. VoiceLink cannot provide DSL, it cannot serve medical or home safety alarms, and it does not have auxiliary power. Because it cannot provide DSL, small businesses will have to pay exorbitant charges to process credit card transactions.

Over 5,000 CWA members wrote to the PSC last year to urge the Commission to strengthen service quality standards to protect consumers, to whom we want to provide good service. The PSC rejected our appeals, as well rejecting a petition from the Attorney General and a letter from senior, labor and consumer groups. As we predicted, service quality has continued to deteriorate, causing more customers to drop service, which leads to more job cuts.

We urge you stop Verizon from abandoning the copper network in non-FiOS areas and replacing it with VoiceLink. We urge you to conduct a full investigation into the impact of these proposed changes, which will destroy jobs and endanger service quality and even public safety during a disaster. We urge you not to allow Verizon to deploy VoiceLink statewide.

Sincerely,

